

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JUL 1 4 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL #7009 1680 0000 7667 0999 RETURN RECEIPT REQUESTED

Mr. Steven Coventry Vice President Akorn, Inc. 1222 W. Grand Avenue Decatur, Illinois 62522

Re: Notice of Violation

RCRA Compliance Evaluation Inspection – Akorn, Inc.

EPA ID No.: ILD 984 906 412

Dear Mr. Coventry:

On April 16, 2014 a representative of the U.S. Environmental Protection Agency inspected the Akorn, Inc. (Akorn) facility, located in Decatur, Illinois. The purpose of that inspection was to evaluate Akorn's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Akorn personnel, a review of records and the inspector's personal observations while inspecting the facility, EPA has determined that Akorn is engaged in the storage of hazardous waste without a hazardous waste storage permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and the U.S. Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, Akorn, as a large quantity generator, must be in compliance with the conditions of 35 IAC § 722.134 (a) and (c) [40 CFR § 262.34(a) and (c)]. We find that Akorn was not in compliance with the following conditions and requirements of RCRA and, therefore, was not exempt from having a hazardous waste storage permit:

1. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste may accumulate as much as 55-gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near the point of generation which is under the control of an operator of the process generating the waste, provided that the containers are marked with either the words, "Hazardous Waste," or with other words that identify the contents. See 35 IAC 722.134(c)(1)(B) [40 CFR 262.34(c)(1)(ii)].

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At the time of the April 16, 2014 inspection, 4-liter satellite accumulation containers of HPLC hazardous waste solvent in the QC/RD lab were not marked with either the words "Hazardous Waste" or with other words that identify the contents. Akorn, therefore, failed to comply with the conditions for a hazardous waste storage permit exemption, and violated the hazardous waste container marking and identification requirement.

2. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste using containers to accumulate hazardous waste must clearly mark the date upon which each period of accumulation begins. See, 35 IAC § 722.134(a)(2) [40 CFR § 262.34(a)(2)].

At the time of the April 16, 2014 inspection, twenty-two 4-liter containers of HPLC hazardous waste solvent were not marked with the date upon which each period of accumulation begins. Akorn, therefore, failed to comply with the conditions for a hazardous waste permit exemption, and violated the hazardous waste container accumulation date marking requirement.

3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste using containers to accumulate hazardous waste must label or mark clearly each container with the words "Hazardous Waste." See, 35 IAC § 722.134(a)(3) [40 CFR § 262.34(a)(3)].

At the time of the April 16, 2014 inspection, twenty-two 4-liter containers of HPLC hazardous waste solvent were not labeled or marked with the words "Hazardous Waste." Akorn, therefore, failed to comply with the conditions for a hazardous waste storage permit exemption, and violated the hazardous waste container marking and identification requirement.

4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must maintain records that document that the required training had been given to, and completed, by facility personnel. See, 35 IAC §§ 722.134(a)(4) and 725.116(d)(4) [40 CFR §§ 262.34(a)(4) and 265.16(d)(4)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC 724.116 (d)(4) [40 CFR 264.16 (d)(4)].

At the time of the April 16, 2014 inspection, Akorn was unable to provide documentation showing that employees took hazardous waste emergency response refresher training in the years 2011 and 2012. Akorn, therefore, failed to comply with the conditions for a hazardous waste storage permit exemption, and violated the training recordkeeping requirement.

5. In order to avoid the need for a hazardous waste storage permit, a large quantity generator's written contingency plan must include, among other things, the names,

addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator. See, 35 IAC §§ 722.134(a)(4) and 725.152(d) [40 CFR §§ 262.34(a)(4) and 265.52(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC § 724.152 [40 CFR § 264.52(d)].

At the time of the April 16, 2014 inspection, Akorn's contingency plan did not list the name, address, and phone number (office and home) of the current primary and alternate emergency coordinators. Akorn, therefore, failed to comply with the above-mentioned condition for a permit exemption and violated the above-referenced contingency plan requirements.

6. A small quantity handler of universal waste must label or mark clearly each waste battery or tank in which batteries are contained with any of the following words, "Universal Waste-Batteries," or "Waste Batteries," or "Used Batteries." See 35 IAC § 733.134(a) [40 CFR § 273.34(a)].

At the time of the April 16, 2014 inspection, the EPA inspector observed two containers of waste batteries that were not marked with any of the above phrases. Akorn, therefore, violated the universal waste marking requirement.

7. A small quantity handler of universal waste must manage used lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. See 35 IAC § 733.113(d)(1) [40 CFR § 273.13(d)(1)].

At the time of the April 16, 2014, inspection, Akorn was storing open containers of loose waste lamps in the north boiler room. Akorn, therefore, violated the universal waste lamp storage requirement.

8. A small quantity handler of universal waste must label or mark each lamp or container or package in which such lamps are contained with one of the following phrases: "Universal Waste Lamps," "Waste Lamps," or "Used Lamps." See, 35 IAC § 733.114(e) [40 CFR § 273.14(e)].

At the time of the April 16, 2014, inspection, Akorn was storing open containers of waste lamps without any of the above phrases. Akorn, therefore, violated the universal waste marking requirement.

9. A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a permit exemption of 35 IAC § 722.134 [40 CFR § 262.34] is an operator of a hazardous waste storage facility and is required to obtain a hazardous waste storage permit. See, 35 IAC §§ 703.121(c) and 702.123 [40 CFR §§ 270.1(c) and 270.13].

Upon failing to meet the conditions identified in items 1 through 5 above, Akorn's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121(c) and 702.123 [40 CFR §§ 270.1(c) and 270.13].

At this time, EPA is not requiring Akorn to submit an application for a hazardous waste storage permit so long as it immediately establishes and maintains compliance with the conditions for a permit exemption specified in 35 IAC 722.134 [40 CFR § 262.34].

According to Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the conditions and requirements listed above.

You should submit your response to:

Sheila Burrus Environmental Protection Specialist U.S. Environmental Protection Agency, Region 5 77 West Jackson Blvd (LR-8J) Chicago, Illinois 60604

If you have any questions regarding this letter, please contact Ms. Burrus, of my staff, at (312) 886-3587.

Sincerely,

Gary J. Victorine, Chief

RCRA Branch

Enclosure

cc: Todd Marvel, (todd.marvel@illinois.gov)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 W. JACKSON BOULEVARD CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME:	Akorn, Inc.				
U.S. EPA ID. No.:	ILD 984 906 412				
LOCATION ADDRESS:	1222 W. Grand Avenue Decatur, Illinois 62522				
DATE OF INSPECTION:	April 16, 2014				
U.S. EPA INSPECTOR:	Sheila Burrus				
PREPARED BY:	Sheila Burrus Environmental Protection Specialist				
REVIEWED BY:	Date: Michael Cunningham, Chief Compliance Section 1 RCRA Branch Land and Chemicals Division				

Date:

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Purpose of Inspection

The purpose of the inspection was to conduct an un-announced compliance evaluation inspection (CEI) at Akorn, Inc. (Akorn), located at 1222 W. Grand Avenue, Decatur, Illinois, to evaluate Akorn's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically those regulations related to the management of hazardous waste and used oil.

<u>Participants</u>: Steven Coventry, Vice President/General Manager, Kim Wasserkrug, Vice President of Domestic Quality Operation, Raymond Standerwick, Engineering Manager, Joseph Frydenger, Environmental Health and Safety Manager, Steve Szamock, Manager of Regulatory Compliance represented Akorn. Sheila Burrus represented EPA Region 5, Land and Chemicals Division.

Installation Description/Background

Akorn is a generic pharmaceutical company engaged in the development, manufacturing and marketing of multi-source and branded pharmaceutical products in the areas of ophthalmology, antidotes, anti-infecting and controlled substances for pain management and anesthesia in the United States and across the globe. The injectable products are manufactured at the Decatur, Illinois, location, as well as two other Akorn facilities. Dosage forms include ampoules and vials, and liquid and lyophilized products. Types of injectables include cephalosporins, penems and hormones and general injectables. The manufacturing process is conducted in sterile, clean rooms.

Some of its customers are Walgreens, CVC and Rite Aid.

Akorn has numerous satellite accumulation containers of High Pressure Liquid Chromatography (HPLC) hazardous waste located within the quality control and research/development (QC/RD) lab. The 90-day hazardous waste storage area and used oil storage is located in the special waste room.

Akorn was last inspected by the Illinois Environmental Protection Agency (IEPA) for compliance with RCRA on January 28, 2009.

Akorn has four sterile fill suites, two 220-square foot freeze dry chambers with fully automated loading and unloading, three active formulation/compounding operations, QC/RD and micro laboratories and six packaging lines. The microbiology lab does not generate hazardous waste.

A review of hazardous waste manifests and waste volume on-site indicates that Akorn has been operating as a large quantity generator of hazardous waste.

Waste Generation

Among the hazardous waste streams generated at this installation are waste ignitable liquids (D001, F003 and F005) and lab packs (various hazardous waste numbers).

The waste ignitable liquids are generated from the manufacturing process (dehydrated alcohol) and from the QC/RD lab (HPLC). The lab packs are generated from expired raw materials.

Fifty to seventy-five percent of the hazardous waste on-site is generated from the QC/RD lab. The remaining 25 percent is generated from the manufacturing process.

Akorn also generates used oil and waste lamps. The used oil is generated from maintenance operations.

Opening Conference

I arrived at Akorn at 8:20 a.m. on April 16, 2014. I introduced myself to the receptionist who contacted facility personnel. I then presented my enforcement credentials and told Steven Coventry, Vice President/General Manager, Kim Wasserkrug, Vice President of Domestic Quality Operation, Raymond Standerwick, Engineering Manager, Joseph Frydenger, Environmental Health and Safety Manager, and Steve Szamock, Manager of Regulatory Compliance the purpose of my visit when we convened in a conference room. I then explained that I would be conducting a CEI that included a visual site inspection (VSI) and records review. I explained to everyone in attendance what specific records I would need to review and then asked for a brief description of the type of work done at this installation and the types of wastes generated. Mr. Standerwick and Ms. Wasserkrug began to provide background and waste stream information about Akorn which is included in the installation description/background and waste generation sections of this report.

I provided a Small Business Resource Information Sheet, the Keys to Success brochure, the U.S. EPA – Region 5 Pollution Prevention Technical Assistance Contacts list and the U.S. EPA Managing Used Oil Advice for Small Business brochure to Ms. Wasserkrug.

I stated that Akorn could claim any information gathered during the inspection as Confidential Business Information (CBI) including: verbal information, documents and photographs. Akorn representatives did not make a CBI claim on the information gathered during the inspection.

I continued the opening conference by asking who picks up Akorn's hazardous waste. Mr. Conventry indicated that Heritage Transport located in East Liverpool, Ohio picks up Akorn's

controlled waste and transports it to Tradebe Treatment and Recycling located in East Chicago, Indiana.

Akorn's hazardous waste is picked up by Bodine Environmental Services located in Decatur, Illinois and/or Thunderbird Trucking located in East Chicago, Illinois and transports it to Tradebe Treatment and Recycling located in East Chicago, Indiana.

Akorn's used oil and waste lamps/batteries are picked up by Bodine Environmental Services located in Decatur, Illinois.

I began the CEI by conducting the visual site portion of the inspection.

Visual Site Inspection (VSI)

I was accompanied by Ms. Wasserkrug, Messrs. Coventry, Frydenger, and Steve Szamock during the VSI. The areas of Akorn's facility inspected included, but were not limited to: the QC/RD/microbiology laboratories, formulation rooms, fill rooms, universal waste storage areas and 90-day hazardous waste storage area/special waste room

I observed the following while touring the QC/RD lab and universal waste storage areas:

- 4-liter satellite accumulation containers of HPLC hazardous waste solvent in the QC/RD lab that were not marked "Hazardous Waste" or with words identifying their contents. The bottles were marked "Hazardous Waste" at the time of the inspection (Photographs 1 through 15).
- Opened containers/loose waste lamps being stored in the north boiler room that were not marked "Universal Waste Lamps" or "Used Lamps" (Photographs 16 through 19).
- Two containers of waste batteries and one container of ballasts being stored in the basement area were not marked with the words "Universal Waste Battery(ies)", "Waste Battery(ies)," or "Used Battery(ies)" (Photographs 20 and 21).

Next, we proceeded to the 90-day hazardous area/special waste storage room where I observed the following:

- Twenty-two 4-liter containers of HPLC hazardous waste solvent being stored in the 90-day hazardous/special waste storage area. None of the containers were marked "Hazardous Waste" or with words identifying their contents, or with an accumulation start date. According to Mr. Frydenger the containers of HPLC were transferred from the QC/RD lab to the hazardous waste storage area one day prior to the inspection and were going to be transferred into a 55-gallon container. I informed Mr. Frydenger that containers of hazardous waste stored in the 90-day hazardous waste storage area must be marked with the date that accumulation began and the words "Hazardous Waste" (Photographs 22 and 23).
- One closed/labeled 55-gallon drum of used oil being stored in the hazardous waste storage area (Photographs 24and 25).
- Three 55-gallon drums of nonhazardous waste containers of dye waste, one 55-gallon of waste vials and several bags of expired raw materials (dextrose). I found it difficult at times to inspect everything within the storage area due to poor housekeeping and inadequate aisle space. I also relayed this information to Mr. Frydenger (Photograph 26).
- Five boxes labeled as <u>Reference Listed Drug Products</u>. Mr. Frydenger stated that the boxes that contained eye drops, propine, voltciren, ophthalmic and capastat sulfate were transferred from the research/development lab the previous day to the 90-day hazardous waste storage area awaiting a waste determination. Mr. Frydenger stated that a waste determination was performed on the above waste and it was determined to be nonhazardous (Photograph 27).
- One closed/labeled 30-gallon container of phosphoric acid dated January 18, 2014. I informed Mr. Frydenger that he had approximately 2 days remaining to transport the container off-site for disposal if he did not want to be in violation of the 90-day storage requirement. Mr. Frydenger stated that the phosphoric acid hazardous waste would be transported off-site the following day for disposal (Photograph 28).

After leaving the 90-day hazardous waste storage area, we proceeded to the formulation/filling areas and microbiology lab (Photographs 29 through 32).

In walking through the Acorn facility, I observed the presence of fire extinguishers and eyewash stations.

Records Review

After the VSI, I began the records review portion of the inspection with the assistance of Ms. Wasserkrug, Messrs. Coventry, Standerwick, Frydenger, and Szamock representing Akorn. I informed the above participants that I wanted to review hazardous waste manifests, weekly inspection logs for the 90 day hazardous waste storage area, training records and annual reports for the years 2011 through 2013. I also requested land disposal restriction notifications, waste analysis data and the most current contingency plan.

My observations are categorized below:

Personnel Training/Job Descriptions

Akorn was unable to provide documentation showing that employees took hazardous waste emergency response refresher training in 2011 and 2012.

Contingency Plan

Akorn's contingency plan needs to be updated to reflect the names of the current primary and alternate emergency coordinators.

Weekly Inspection Logs

Akorn was unable to provide documentation showing that weekly inspections of the hazardous waste storage area were conducted in the years 2011 and 2012. Akorn provided inspection logs for review from September 20, 2013 through April 10, 2014.

I reviewed all of the remaining records and found them to be complete.

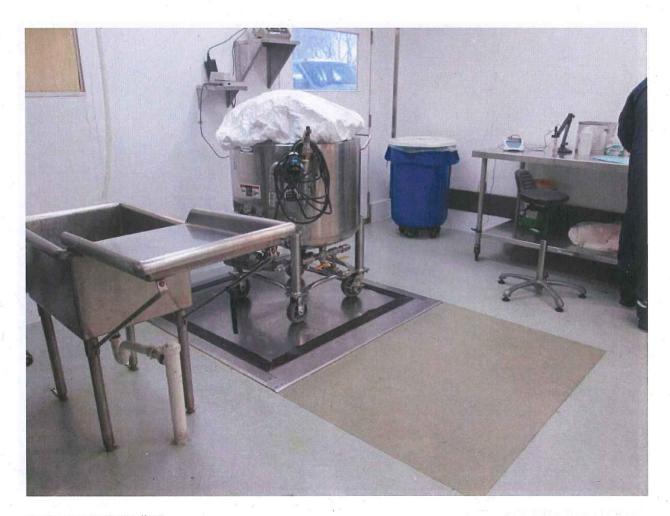
Closing Conference

In closing, a brief conference was held. I summarized where Akorn's personnel had taken me during the VSI and what information was presented to me. I summarized my concerns to all participants in attendance at the closing conference. I thanked them for their cooperation and concluded the CEI at approximately 2:15 p.m.

Attachment

Inspection Checklist Photographs 1 through 32

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LOCATION OF PHOTOGRAPH:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

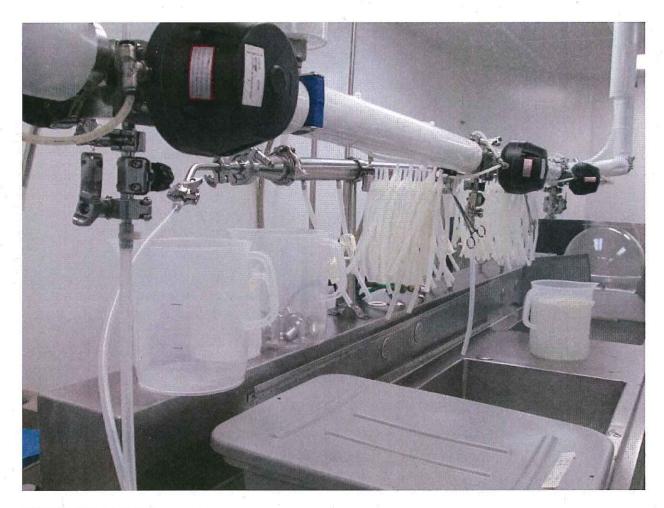
April 16, 2014

micro lab

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

fill room

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

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INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

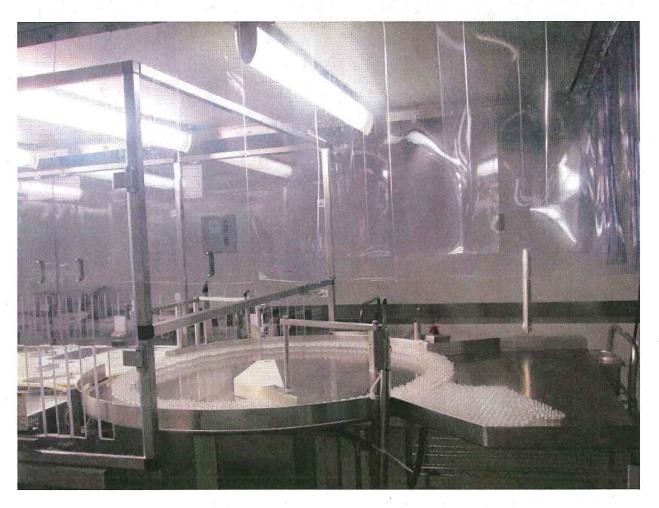
April 16, 2014

fill room

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



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INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

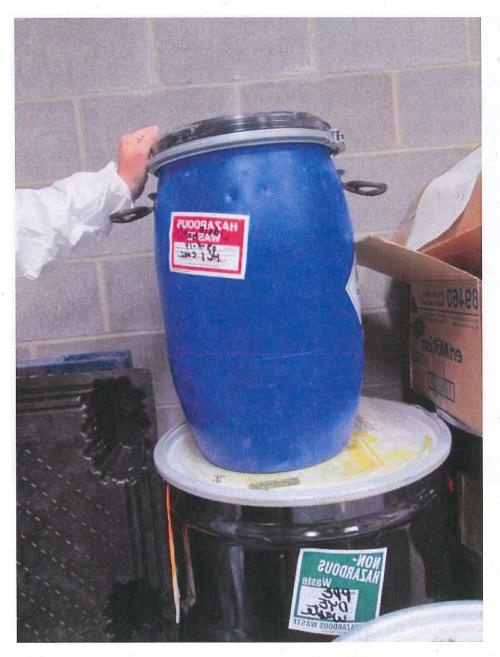
April 16, 2014

formulation area

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

90-day hazardous waste storage area

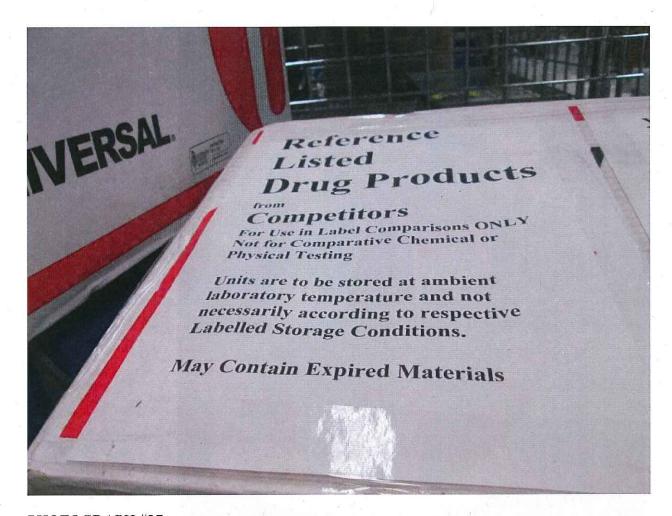
30-gallon container of HPLC hazardous waste

dated 1/18/14

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

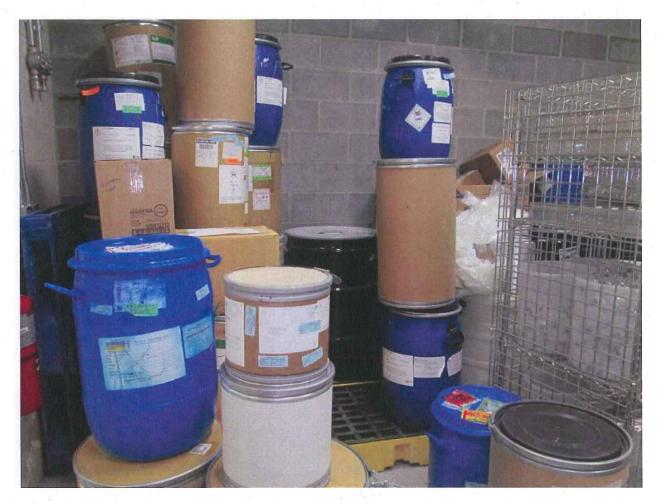
90-day hazardous waste storage area

Reference Listed Drug Products

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

Sheila Burrus

April 16, 2014

90-day hazardous waste storage area

inadequate aisle space, 55-gallon containers of

nonhazardous dye waste, 55-gallon container of waste

vials, and expired raw material (dextrose)

1222 W. Grand Avenue

Decatur, Illinois

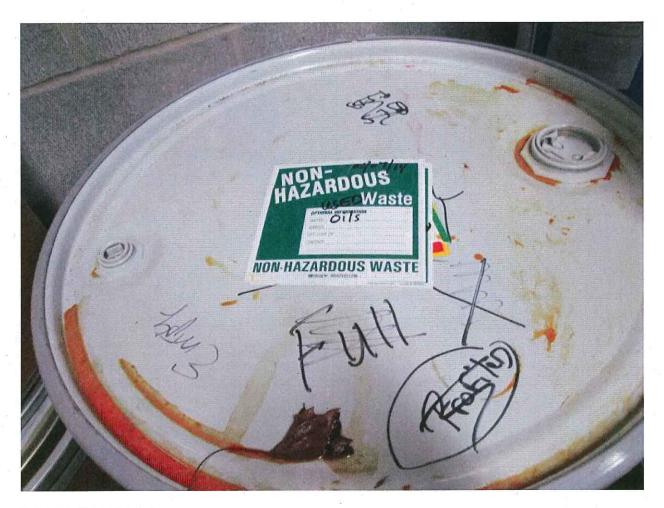
Akorn, Inc.

ILD 984 906 412

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #



NAME OF PHOTOGRAPHER:

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INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

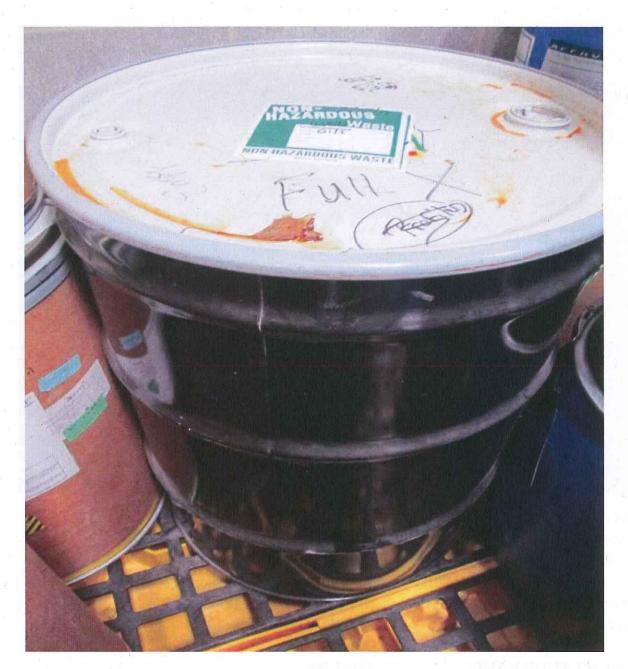
90-day hazardous waste storage area

lableled 55-gallon container of used oil

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

90-day hazardous waste storage area

lableled 55-gallon container of used oil

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

90-day hazardous waste storage area

HPLC hazardous waste

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

90-day hazardous waste storage area

HPLC hazardous waste

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

basement

waste batteries

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

Basement

waste batteries

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

north boiler room

open/loose waste lamps

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



PHOTOGRAPH #18

NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME: INSTALLATION I.D. #

Sheila Burrus
April 16, 2014
north boiler room
open/loose waste lamps
1222 W. Grand Avenue
Decatur, Illinois
Akorn, Inc.
ILD 984 906 412



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

north boiler room

loose/open waste lamps

1222 W. Grand Avenue

Decatur, Illinois

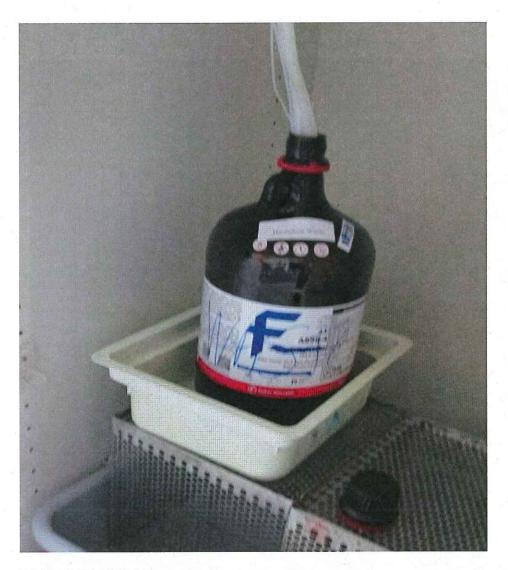
Akorn, Inc.



PHOTOGRAPH #16
NAME OF PHOTOGRAPHER:
DATE OF PHOTOGRAPH:
LOCATION OF PHOTOGRAPH:
SCENE BEING PHOTOGRAPHED:
SITE LOCATION:

INSTALLATION NAME: INSTALLATION I.D. #

Sheila Burrus
April 16, 2014
north boiler room
open/loose waste lamps
1222 W. Grand Avenue
Decatur, Illinois
Akorn, Inc.
ILD 984 906 412



NAME OF PHOTOGRAPHER: Sheila Burrus
DATE OF PHOTOGRAPH: April 16, 2014

LOCATION OF PHOTOGRAPH: QC/RD Lab

SCENE BEING PHOTOGRAPHED: labeled satellite accumulation container of

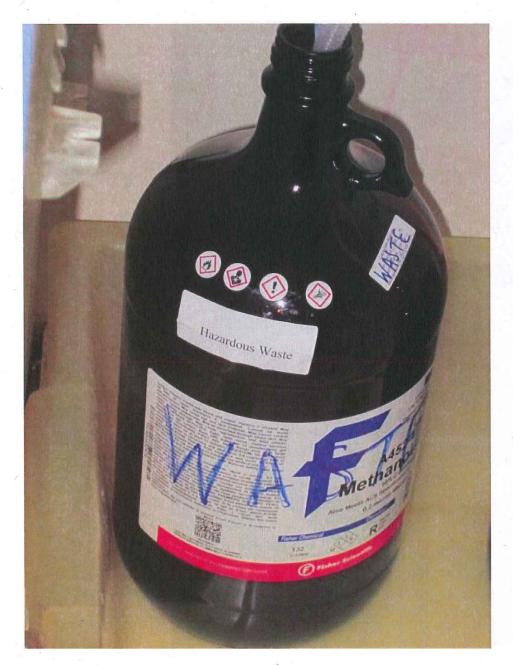
HPLC hazardous waste

SITE LOCATION: 1222 W. Grand Avenue

Decatur, Illinois

INSTALLATION NAME: Akorn, Inc.

INSTALLATION I.D. # ILD 984 906 412



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

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SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

QC/RD Lab

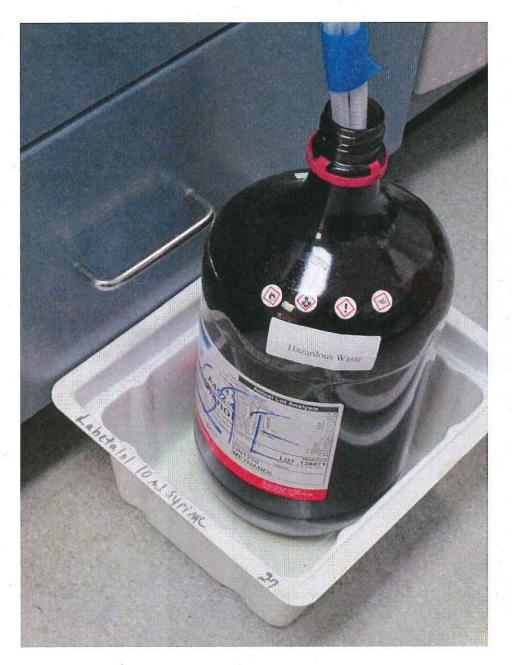
labeled satellite accumulation container of

HPLC hazardous waste

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

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SCENE BEING PHOTOGRAPHED:

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Sheila Burrus

April 16, 2014

QC/RD Lab

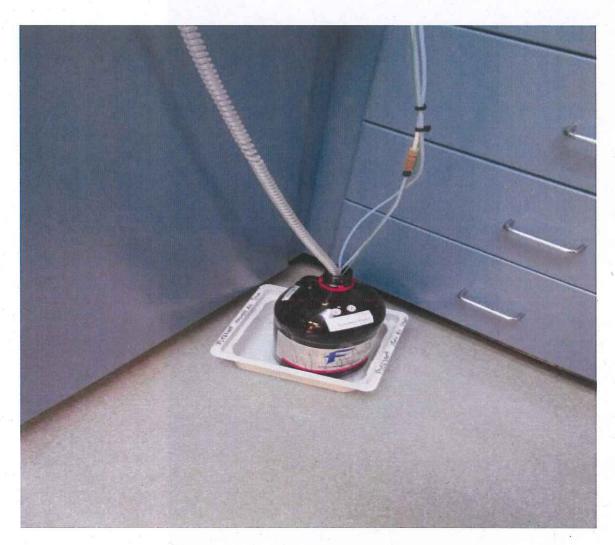
labeled satellite accumulation container of

HPLC hazardous waste

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

April 16, 2014

QC/RD Lab

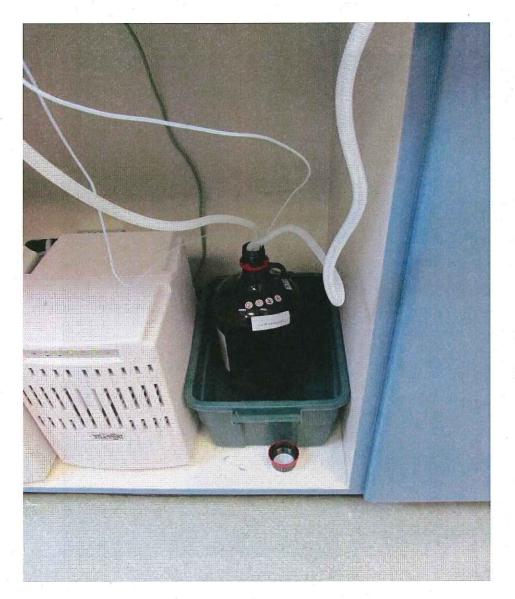
labeled satellite accumulation container of

HPLC hazardous waste

1222 W. Grand Avenue

Decatur, Illinois

Akorn, Inc.



NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SCENE BEING PHOTOGRAPHED:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

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QC/RD

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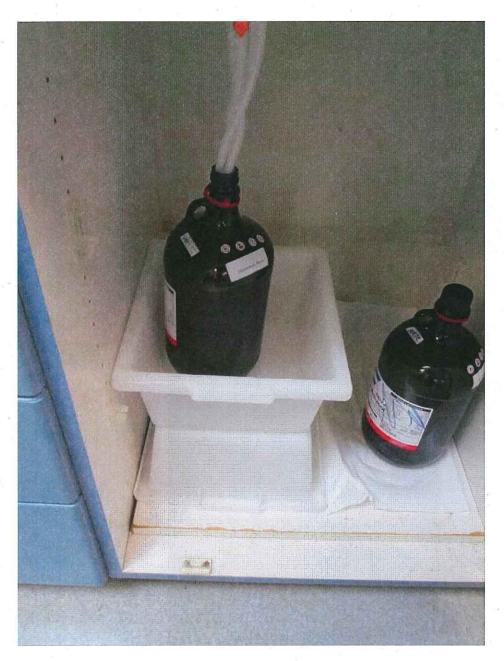
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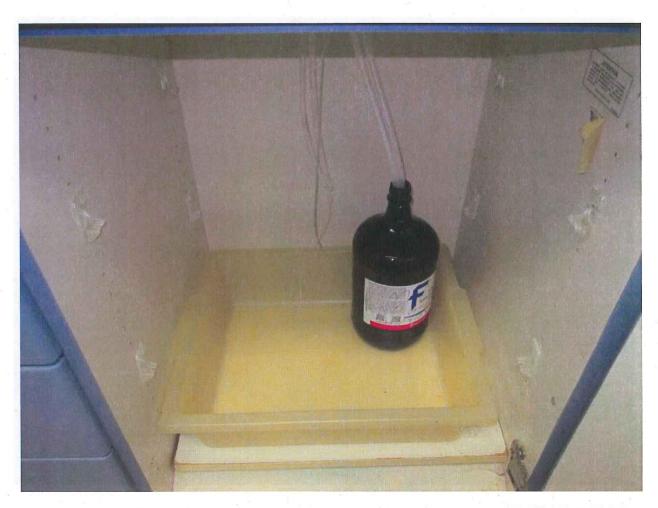
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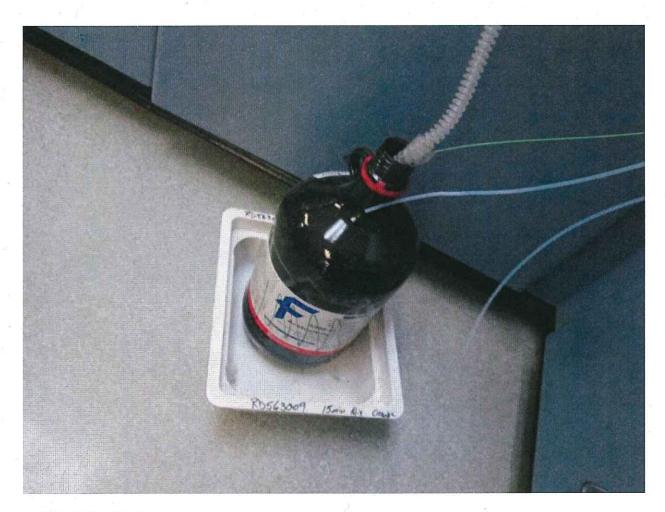
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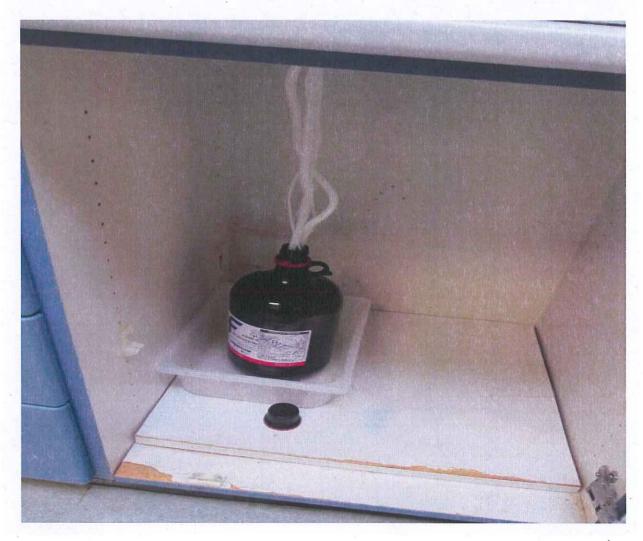
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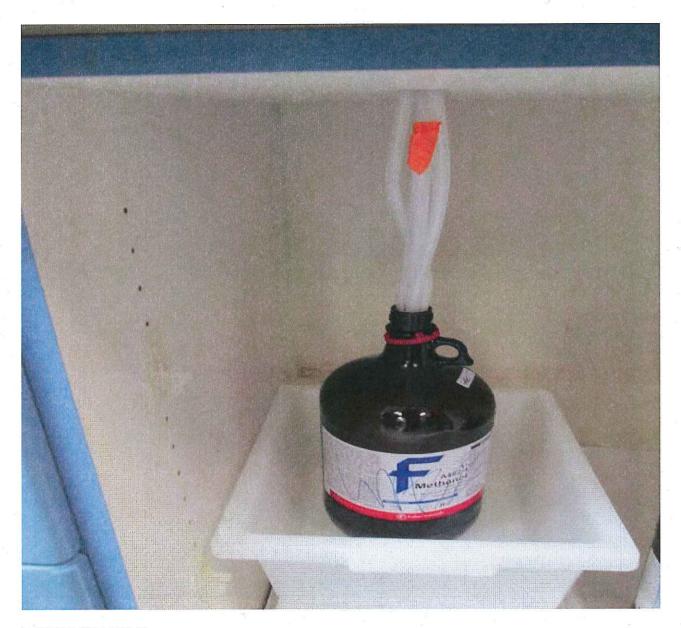
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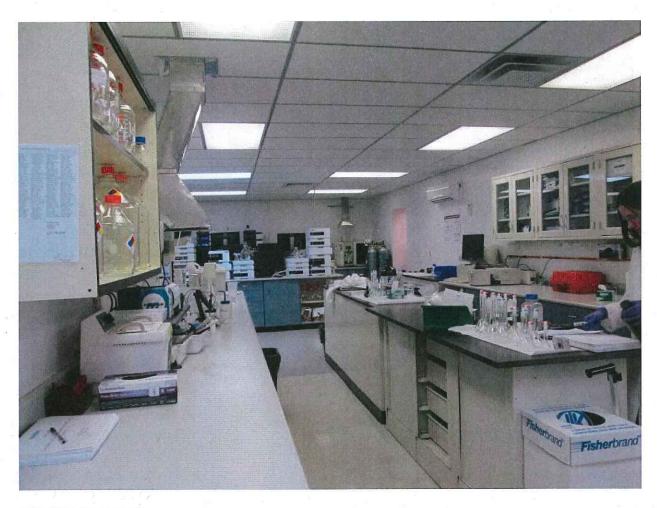
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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
Neguiativii	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE	† 1914HVH
	(>1000 KG/MO.)	
	CURPA DE A CENTERAY	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination	•
	Has the generator correctly determined if the solid wasters) it generates is a hazardous waste? Yes No N/A	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728?	/22.111
	Yes No N/A	
308.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes No N/A	
	Section 722.112 USEPA Identification Numbers	808.121(a)
722,112(a)	Has the generator obtained a USEPA identification number?	
	Yes No N/A	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities	
	that have a USEPA identification number?	700 110(-)
	Yes No N/A SUBPART B: THE MANIFEST	722.112(c)
	SUDFART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes No N/A	•
722.120(b)	Does the manifest designate a facility permitted to handle the waste?	722.120(a)
122.120(0)	Yes No N/A	
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility?	722.120(b)
	Yes No N/A	
	Section 722.121 Acquisition of Manifests	722.120(d)
	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois?	
722.121(a)	Yes No N/A	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated?	``
	Yes	
	Yes No N/A	722.121(b)
	Section 722.122 Number of Copies	
722,122	Does the manifest consist of at least 6 copies? Yes \ No \ N/A	722.122
	Section 722.123 Use of the Manifest	
722,123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand?	
	Yes_\ No N/A	
	- obtained the handwritten signature and the date of acceptance by the initial transporter?	722.123(a)
	Yes No N/A N/A retained one copy as required by Section 722.140(a)?	`,
	Yes_\(No_\) No_\ N/A_\\ - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days?	
	- apparently sent a copy (part 5 for the filmois maintest) to the Agency within 2 working days? Yes No N/A	
722.123(b)	- has the generator apparently given the remaining copies to the transporter?	722.123(b)
(0)	Yes No N/A	
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?	
	Yes No N/A	
		722.123(c)

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
	Is there any hazardous waste ready for transport off-site? Yes No V N/A	
722.130	If so, is the generator complying with the pre-transport requirements in Subpart C? YesNoN/A	722.130
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes No N/A	
(722 124(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB,	
(722.134(a)(1))	and CC? Yes No No N/A N/A	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)?	
	Yes No N/A	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?	
	Yes No N/A 1/2	
·	D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?	
	Yes No N/A	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes No N/A	22-41the
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?	22-4 libes bottles of Hischwoofe
	Yes No N/A	PIT CO
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?	
	Yes No N/A	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	a a sa a
	Does the facility accumulate hazardous waste in containers? Yes / No N/A	·
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
	Has the generator closed an accumulation area?	725.211
(725.211) (725.214)	Yes No N/A If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes No N/A	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?	
	Yes No N/A	
(725.272)	Is the waste compatible with the container and/or liner? Yes No N/A	·
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes	·
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking?	
	Yes \(\square \text{No} \text{N/A}	

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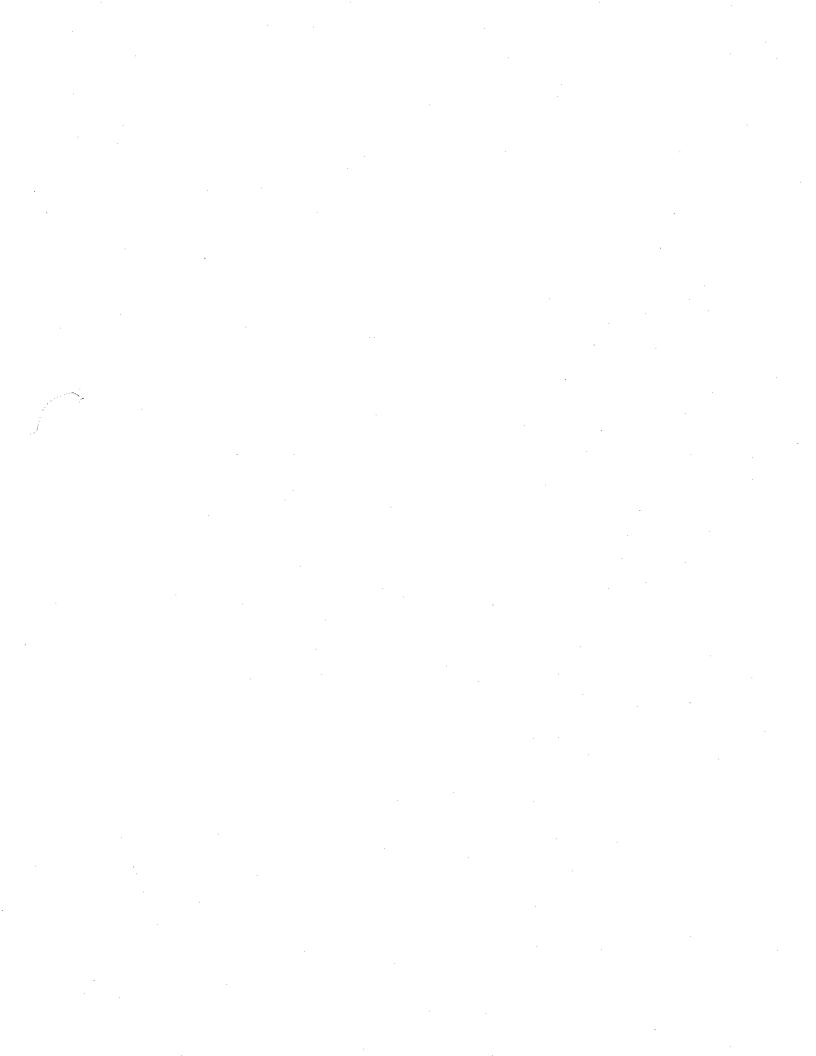
Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes \(\sum \text{No} \text{No} \text{N/A} \)	
	Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)	,
	Yes No N/A	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	
	Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes?	
	COMMENTS:	
(725.278)	Section 725.278 Air Emission Standards Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?	
	Yes No N/A	
	Comments:	
	1	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes No N/A	
	Note: If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
	Has the generator closed an accumulation area?	725.211
(705.011)	Yes No N/A If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?	725.214
(725.211) (725.214)	Yes No N/A	
(725.290)	Does the facility accumulate or treat hazardous waste in tanks?	
	Yes No N/A	
	Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.	
	If "No", skip Subpart J.	
	a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.	
	 b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 723.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart. 	

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Regulation		RCRA GENERATOR I	NSPECTION C	CHECKLIST	(PART 722)	Violation
(725.291(a))	seconda	es existing prior to July 14, 1986 (see ry containment system, has a written nee with Section 702.126(d) by Janu	assessment been rev	viewed and certif	ied by an IRPE(*) in Section 725.291(c)]?	
(725.291(b))	1) 2) 3) 4) 5)	is assessment consider at least the foldesign standards for the tank and an hazardous characteristics of the was existing corrosion protection measured documented age of the tank system results of a leak test, internal inspection.	recillary equipment? Yesstes? Yesures? Yes? Yesction, or other tank i		N/A N/A nrange	
(725.291(c))	Has a ta	ink system assessment been performe us waste? If an assessment indicates a tank sy with the requirements of Section 7	ed within 12 months Yes existem is leaking or use	No	N/A	
(725.292(a))	07/14/86 702.126	v tanks (see definition of new tanks u 6, has a written assessment been revi b(d) prior to operation of the tank sys e assessment include, at a minimum, design standards for tanks and anci hazardous characteristics of the wa	ewed and certified b tem? Yes the following: illary equipment? Yes ste(s) to be handled	y an IRPE in acc No No No 7	ordance with Section N/A N/A	
	3) 4) 5)	evaluation of potential for corrosio components in contact with soil or design or operational measures that resulting from vehicular traffic? designs to ensure adequate foundat to withstand the effects of frost here	Yes twill protect underg Yes cions, anchoring to p	No_ round tank syste	N/A_ms from potential damage N/A_ or dislodgment and the ability	
(725.292(g))	certifica	owner/operator obtained and kept or ation statements [as required in Sections (b) through (f)?	n file at the facility th	he written statem	ents, including the	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	Is secondary containment provided for any new tank system before being put into service?	
	Yes No N/A Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89?	
	Yes No N/A For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later?	
	Yes No N/A For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes No N/A	
	or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later?	
	Yes No N/A For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87?	
	Yes No N/A	-
(725.293(b))	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time?	
	Yes No N/A Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed?	
•	Yes No N/A	
(725.293(e))	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes No N/A	·
	placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes N/A	·
	provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours?	
	4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?	
	Yes No N/A	
	is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours?	
	Yes No N/A	
	Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	
(725.293(d))	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or	
	3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes No N/A	
(725.293(e))	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?	
,	Yes No N/A	١



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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation				
(725.293(f))						
	(c)? Yes No N/A					
	If "No": Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?					
	Yes No N/A 2) Are welded flanges, joints and connections inspected daily?					
	Yes No N/A					
	3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes No N/A					
	4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes No N/A					
(725.293(i))	Until such time as secondary containment is provided, are the following requirements being met for all tank					
	systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?					
÷	Yes No N/A					
	2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?					
	Yes No N/A 3) Are written records maintained at the facility to document the assessments required under					
	Subsections (i)(1) and (i)(2)?					
	Yes No N/A					
	Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.					
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the					
	system to rupture, leak, corrode or otherwise fail?					
	Yes No N/A					
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:					
	1) spill prevention controls? Yes No N/A					
	2) overfill prevention controls?					
	YesNoN/A					
	3) sufficient freeboard in uncovered tanks? Yes No N/A					
(725.284(a))						
(725.294(c))	Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.					
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment?					
	Yes No N/A					
	2) the aboveground portion of the tank system for corrosion or releases? Yes No N/A					
	3) data from monitoring equipment?					
	Yes No N/A					
	Yes No N/A	-				
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?					
	Yes No N/A					
(725,295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?					
	Yes No N/A					

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:	S.
	a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?	
	b) removed applicable waste from the system within 24 hours of detection?	
	Yes No N/A	
	c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?	
	Yes No N/A	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes No N/A	
	d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?	
	Yes No N/A	
	Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	
(725.296(e))	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes No N/A	
	e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?	
	e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes N/A	
	e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?	
	Yes No N/A	
(725.296(f))	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?	
	Yes No NA	
	Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (a)(4), the tank system must be closed in accordance with Section 725.297.	• .
(725.297(a))	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?	
	Yes No N/A	
(725.297(a))	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?	
	Yes No N/A	\
(725.297(b))	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?	
	Yes No N/A	
·	Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	

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Regulation	RCRA GENERATOR INSPECTI	ON CHECKLIST (PART 722)	Violation
(725.298(a))	Are ignitable or reactive wastes placed in a tank system? Yes	No N/A	
	If "No", skip to Section 725.299.		
1	Is the waste treated, rendered or mixed before or immedia the resulting waste, mixture or dissolved materia Yes		
	- Section 725.117(b) is complied with? Yes		·
	or Is the waste accumulated or treated so that it is protected ignition or reaction?	from any material or conditions which may lead to	
	or Yes	No N/A	
	Is the tank used solely for emergencies? Yes	No N/A	
(725.298(b))	Is the facility complying with the requirements regarding waste management area and any public ways, streets, alley Yes	maintenance of protective distances between the ys or any adjoining property line? No N/A	
(725.299)	Are incompatible wastes/materials placed in the same tank		
	If "No", skip to Section 725.300.	1	
·	Is Section 725.117(b) being complied with? Yes	No N/A	
	Has the tank system been properly decontaminated if it pr Section 725.117(b) is complied with? Yes		
	COMMENTS:		
(725.302)	Section 725.302 Air Emission Standards Is the owner or operator managing all hazardous waste pla and CC of Part 725?	aced in tanks in accordance with Subparts AA, BB	
	Yes	No N/A	
	Comments:		
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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)				
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION				
(Is the facility being operated and maintained to minimize the possibility of a fire, hazardous waste or hazardous waste constituents which could threaten human heaten and the second se		1		
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes No	N/A			
	b) a telephone or other device to summon emergency assistance from local Yes V No				
	c) portable fire extinguishers, fire control equipment, spill control equipment?				
	d) water at adequate volume and pressure for fire control? Yes No No No No	N/A			
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protect equipment and decontamination equipment?	tion equipment, spill control			
(20.2.10.1)	Yes				
(725.134)	Where hazardous waste is being handled, do all employees have immediate a other emergency communication device?				
	b) If there is ever just one employee on the premises when the facility is operating immediate access to a device capable of summoning external emergency assistant and the summoning external emergency as a summoning external emergency and the summoning emergency and the summoning external emergency and the summoning emergency and the summoning emergency external emergency and the summoning emergency external emergenc				
(725.135)	Is the facility maintaining adequate aisle space? YesNo	N/A			
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for waste:	the type of facility and			
	arrangements with local emergency authorities (i.e. police and fire deparresponse agencies) to familiarize them with the layout of the facility, probable handled, places where facility personnel would be working, entrances to evacuation routes? Yes No	operties of hazardous waste			
	- agreements designating the primary authority where more than one police respond?				
	Yes No No Agreements with State emergency response teams contractors and equip	N/A ment suppliers? N/A			
	- arrangements to familiarize local hospitals with the properties of hazarder facility and the type of injuries or illnesses which could result from firest the facility?	ous waste handled at the			
	YesNo	N/A			
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROC	EDURES	No reusion		
(725.151(a))	Is the contingency plan available? Yes No	N/A	since the		
	If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to YesNo	the air, soil and water? N/A	development of the plan		
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes No	N/A			
	If "Yes", has the contingency plan been carried out immediately? YesNo	N/A			
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes Y. No	N/A			
	- explosions? Yes No No No No No	N/A N/A			



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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)						
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? - hospitals? - contractors? - emergency response teams? Yes V No No No No	N/A N/A N/A					
725.152(d)	Does the plan contain the current emergency coordinator's name, phone (office and l	nome) and address? N/A					
(725.152(e))	Does the plan identify all emergency equipment including? - description? Yes V No - capability? Yes No - location? Yes No Is the list of emergency equipment up-to-date? Yes No No	N/A N/A N/A N/A					
725.152(f))	Does the plan include: - an evacuation plan? Yes No	N/A N/A N/A					
725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes No	N/A N/A N/A N/A					
725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes	N/A N/A					
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes No	N/Ato carry out the actions					
725.156)	Yes No If the facility has had a release, fire or explosion, have the procedures of this Section assessment, response and reporting? Yes No						
	Yes No	N/A					

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	Section 725.116 Personnel Training Does the facility have a training program?	
	Yes_\ No N/A	
	Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725?	
	Yes \(\frac{1}{2} \) No N/A Is the program directed by a person trained in hazardous waste management procedures?	
	Yes_\frac{1}{2} No N/A Does the program teach facility personnel hazardous waste management procedures (including contingency	
	plan implementation) relevant to the positions in which they are employed?	
	Yes No N/A	
•	Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems?	
	Yes V No N/A	
	- procedures for using, inspecting, repairing and replacing facility emergency and monitoring	
	equipment?	
	Yes Y No N/A N/A - key parameters for automatic waste feed cut-off systems?	
	Yes No N/A	
	- communications or alarm systems? Yes V No N/A	
	- response to fire or explosions?	
	Yes No No N/A	
	- response to groundwater contamination incidents? Yes V No N/A	
	- shutdown of operations?	·
	Yes No N/A	
(725.116(b))	Have new employees completed the program within 6 months of the date of employment or assignment to a	,
	position requiring them to manage hazardous waste?	2011+2012
	Yes No N/A	201142010
(725.116(c))	Have facility personnel received an appual review of the initial training?	
	Yes No N/A	
(725.116(d))	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job?	
	Yes No N/A	
	2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position?	
	Yes V No N/A No N/A No written description of the type and amount of both initial and continuing training that will be given	
	3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management?	
	Yes No N/A	
• •	4) records documenting that the training or job experience has been given to and completed by facility	no document for 2011+2
	personnel? Yes No N/A	for anily n
	Yes No N/A	
(725.116(e))	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment?	
	Yes No N/A	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?	
	Yes No N/A Is the plan on-site?	
	Yes No N/A Does the plan include a detailed physical and chemical analysis?	
	Yes _ √ No _ N/A _ Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?	
	Yes √ No N/A Has the generator submitted the required notification and certification that the waste meets treatment standards	
	when the waste is shipped off-site? Yes No N/A	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other	Le-8 bottles
	words identifying the contents? Yes No N/A	HALC Not marke
	Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(h) within 3 working days? Yes No N/A	words
	If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?	Hiw, or Otherwork
	Yes No N/A During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)	to identifi
·	with respect to the excess waste? Yes No N/A	the conter
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes No N/A	722 140()
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three	722.140(a)
,22.110(0)	years from the due date of the report (March 1)? Yes No. N/A	
722 140(~)		722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111?	
	Yes No N/A	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes No N/A	
		722,140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes	
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and	722.141(a)
	Reporting Section.	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year?	
	Yes No N/A	722.141(b)
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste?	722,141(0)
	Yes No N/A	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes	
	N/A V	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director?	
	Yes No N/A	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? YesNoN/A	
	If "Yes", has the generator complied with the requirements of Subpart E? YesNoN/A	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? YesNo*\ N/A	
	If "Yes", has the generator complied with the requirements of Subpart F? Yes No N/A	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes No N/A	
	If "Yes", has the generator complied with the requirements of Subpart G? Yes No N/A	722.170
	COMMENTS:	722.170

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